SOLOMON E. GRESEN, ESQ. (SBN 164783) 1 **RGLAWYERS, LLP** 16200 Ventura Blvd., Suite 407A 2 Encino CA 91436 3 Tel: (818) 815-2737 Fax: (818) 815-2737 4 seg@rglawyers.com 5 Attorneys for Plaintiff, Andrea Love 6 7 UNITED STATES DISTRICT COURT 8 CENTRAL DISTRICT OF CALIFORNIA 9 10 ANDREA LOVE, an individual, Case No.: 2:23-cv-3122 11 Plaintiff, **COUNSEL JASON M. INGBER'S** 12 **DECLARATION IN SUPPORT OF** PLAINTIFF'S NOTICE OF MOTION AND VS. 13 MOTION TO REMAND REMOVED **ELLEN STONE**, an individual; and DOES 1 **ACTION** 14 through 25, inclusive 15 (28 U.S.C.S. §1447(c)) Defendants. 16 17 Complaint Filed: 2.28.2023 LASC Case No.: 23STCV04399 18 19 20 21 22 23 24 25 26 27 28

- 1. I, Jason M. Ingber, work with RGLaywers LLP and Solomon Gresen and am cocounsel and lead trial counsel for Plaintiff for this matter, and if called upon to testify could and would testify to the following under the penalty of perjury.
- 2. Plaintiff filed this Action in Los Angeles Superior Court on February 28, 2023. On or about May 12, 2023, I spoke with Defendant's counsel over the phone regarding our overall perspectives to this case, a roadmap to potential resolution, and that Plaintiff plans to challenge Defendant's removal on the grounds that Defendant was and is domiciled in Los Angeles, California. On or about June 7, 2023, I met with defense counsel Brook Hammond in person at her office, and explained Plaintiff's intent to file a motion to remand on account of the fact that Defendant lives in Los Angeles, and I followed up with numerous emails, and a zoom call with defense counsel Brooke Hammond regarding the same.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed this 23rd day of June 2023, in Los Angeles, California.

/s/ Jason M. Ingber Jason M. Ingber